

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

	DOCKET	FILE	COPY	ORIGINAL	
In the Matter of	)				
	)				
Amendment of Section 73.622	)				RM No. _____
of the Commission's Rules	)				
Digital Television Table of Allotments	)				MM Docket No. _____
(Mt. Cheaha, Alabama)	)				

To: The Chief, Allocations Branch

**PETITION FOR RULEMAKING**

Alabama Educational Television Commission ("AETC"), licensee of noncommercial television station WCIQ-TV, NTSC Channel 7, Mt. Cheaha, Alabama, by its attorneys, hereby respectfully petitions the Commission for a rulemaking to modify Commission's Digital Television Table of Allotments, as described in Section 73.622 of the Commission's Rules. Specifically, AETC requests that the Commission substitute Channel 4, Mt. Cheaha, Alabama, for Channel 56, Mt. Cheaha, Alabama, as the noncommercial digital television allotment to be used by the digital television station WCIQ-DT, and to take any other steps necessary to enable WCIQ-DT to apply to construct and ultimately operate its facilities on Channel 4, as described in the attached Engineering Statement (the "Proposal").

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In a series of orders, the Commission has specified Channels 2-51 as digital television core spectrum (the "Core Spectrum"). <sup>1/</sup> Television stations may operate outside the Core Spectrum during the period in which such stations are transitioning to digital broadcasts (the "Transition Period"). After the Transition Period, however, television stations broadcasting on channels outside the Core Spectrum must surrender their licenses for such channels and commence digital broadcast operations on some channel within the Core Spectrum. <sup>2/</sup> Accordingly, any station with a digital allotment outside the Core Spectrum would, in most cases, have to construct two digital facilities -- one to be used on the non-core channel during the Transition Period, and one to be used on a core channel after the Transition Period. *See id.*

In the *Reconsideration Order*, the Commission "recognize[d] the additional burden placed on licensees with out-of-core DTV allotments." *Id.* at 7440. Moreover, the Commission emphasized that "the allotment of out-of-core channels may present a particular burden to noncommercial . . . licensees." *Id.* at 7441. The Commission promised that "to the extent that in-core channels [are] available during the transition, [it] will attempt to further reduce the number of out-of-core allotments" through "future amendments to the Table." *Id.* at 7440-41.

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<sup>1/</sup> See, e.g., *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, 13 FCC Rcd 7418, 7435-37 (1998) ("*Reconsideration Order*"); *Sixth Report and Order*, 12 FCC Rcd 14588 (1997) ("*Sixth Report and Order*").

<sup>2/</sup> See, e.g., *Reconsideration Order*, 13 FCC Rcd at 7439-42.

Adoption of the Proposal would enable the Commission to mitigate the burdens of the digital transition to one such noncommercial licensee. AETC is a public agency that provides noncommercial educational programs to residents throughout Alabama. It has a limited budget. Any funding that must be spent on technical matters is funding that AETC cannot dedicate to public programming. If the Commission adopts the Proposal, which would substitute a Core Spectrum digital allotment for WCIQ-DT for the current, non-core allotment, AETC would need to design and construct only one set of digital transmission facilities. Accordingly, the Proposal would reduce the construction costs AETC will incur in making WCIQ-TV's digital transition, which would enable more of AETC's limited funds to continue to be used to maintain and improve other aspects of its services.

A Technical Statement, attached as Exhibit 1 and incorporated by reference in this Petition, confirms that the proposed allotment change is consistent with the Commission's technical rules. *See* 47 C.F.R. § 73.623. For the convenience of the Commission, the Technical Statement includes all the information that would be necessary for AETC to apply for a construction permit for WCIQ-DT on Channel 4, as well as demonstrating that the proposed allotment change would not result in inappropriate levels of interference. A statement from AETC affirming that it will apply for the allotment if changed as proposed is also attached.

For all the foregoing reasons, the Commission should adopt the Petition, approve the proposed modification in WCIQ-DT's channel allotment, and make all other changes necessary and appropriate to enable AETC to apply to construct WCIQ-DT's transmission facilities on Channel 4.

Respectfully submitted,

ALABAMA EDUCATIONAL  
TELEVISION COMMISSION

By: *F. William LeBeau*  
Marissa G. Repp  
F. William LeBeau

HOGAN & HARTSON L.L.P.  
555 13th Street, N.W.  
Washington, DC 20004-1106  
(202) 637-5600  
Its Attorneys

February 17, 1999

**EXHIBIT 1**  
**(Technical Statement)**

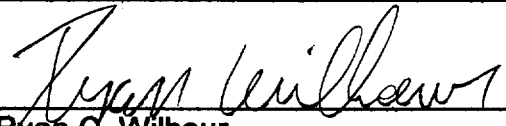
**ENGINEERING STATEMENT OF  
RYAN WILLOUR  
ON BEHALF OF  
ALABAMA EDUCATIONAL TELEVISION COMMISSION  
LICENSEE OF TV BROADCAST STATION  
WCIQ-TV, MT. CHEAHA, AL**

The Alabama Educational Television Commission is licensed to operate WCIQ-TV on channel 7 with an ERP of 316.0 kW at an antenna height of 911 meters above mean sea level ("AMSL"). The FCC allocated channel 56 for DTV service using an ERP of 1,000 kW at an antenna height of 610 meters above average terrain ("AAT") to replicate the licensed channel 7 Grade B coverage contour. This will require the purchase of a new transmitting plant consisting of a high power UHF DTV transmitter, large coaxial transmission line or waveguide, and a medium gain transmitting antenna. The UHF DTV will consume substantially more power than the present VHF transmitter. Furthermore, DTV channel 56 is not within the "core" channels planned for television broadcasting after the transition from NTSC to DTV is complete. Therefore, at the end of the transition period WCIQ-TV would change to channel 7 for its permanent DTV operation requiring the purchase of another new DTV transmitter. At that time The Alabama Educational Television commission would be left with a relatively new UHF DTV transmitting plant which would be very costly to decommission, and for which it has absolutely no use.

As an alternative, I have completed studies that indicate that channel 4 with an ERP of 6.3 kW at an effective antenna height of 562 meters above average terrain could be used to achieve the same coverage area as the current NTSC operation and would also eliminate the need for a future modification. Attached to this document is a sample application for the requested channel 4 amendment. This request for change in DTV channels meets the required mileage separation to other NTSC / DTV co-channel and adjacent channel stations as described in section §73.623(d). Therefore, it is respectfully requested that the DTV channel allotted to WCIQ-TV, at Mt. Cheaha be changed from channel 56 to channel 4.

This engineering statement has been prepared by Ryan C. Wilhour who is a graduate of the University of Florida with a Bachelor of Science degree in electrical engineering, and is an associate of Kessler and Gehman Associates, Inc., with offices in Gainesville, Florida.

**KESSLER AND GEHMAN ASSOCIATES, INC.**

  
\_\_\_\_\_  
Ryan C. Wilhour  
Engineering consultant  
January 28, 1999

**APPLICATION FOR CONSTRUCTION PERMIT  
TELEVISION BROADCAST STATION WCIQ  
DTV CHANNEL 4 ERP 6.3 kW AT 562 METERS  
ABOVE AVERAGE TERRAIN ALABAMA  
EDUCATIONAL TELEVISION COMMISSION  
MT. CHEAHA, ALABAMA**

**KESSLER AND GEHMAN ASSOCIATES, INC.**  
**TELECOMMUNICATIONS CONSULTING ENGINEERS**

**KG&A**

507 NW 60<sup>th</sup> Street, Suite C  
Gainesville, Florida 32607

# SECTION V-D - DTV BROADCAST ENGINEERING DATA

FOR COMMISSION USE ONLY

File No. \_\_\_\_\_  
SSB Referral Date \_\_\_\_\_  
Referred By \_\_\_\_\_

Name of Applicant

ALABAMA EDUCATIONAL TELEVISION COMMISSION

Call Letters (if issued)

WCIQ-DT

Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Items 1-22, below. If an item is not applicable, enter N/A.

**Certification Checklist:** A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

1 The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:

- (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☒ No
- (b) It will operate from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. ☒ Yes ☐ No
- (c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. ☒ Yes ☐ No
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. ☒ Yes ☐ No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. ☒ Yes ☐ No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. ☒ Yes ☐ No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. ☒ Yes ☐ No

## Application Data:

1. Channel

(a) DTV Channel No. 4

(b) Associated analog TV station channel no., if any 7

2. Principal community to be served:

City or Town	State
MT. CHEAHA	AL

3. Effective radiated power (average power): (in the main lobe of radiation, if directional) 6.3 kw
4. Height of antenna radiation center above average terrain (HAAT): (to the nearest meter) 562 meters

## 5. Purpose of Application: (check appropriate boxes)

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Construct a new (main) facility   | <input type="checkbox"/> Construct a new auxiliary facility               |
| <input type="checkbox"/> Modify construction permit for main facility | <input type="checkbox"/> Modify construction permit for auxiliary antenna |
| <input type="checkbox"/> Modify licensed main facility                | <input type="checkbox"/> Modify licensed auxiliary antenna                |

If purpose is to modify, indicate the nature of change(s) by checking appropriate box(es) and specify the file number(s) of the authorizations affected.

- |   |   |
|---|---|
| <input type="checkbox"/> Antenna supporting structure height  | <input type="checkbox"/> Effective radiated power |
| <input type="checkbox"/> Antenna height above average terrain | <input type="checkbox"/> Channel                  |
| <input type="checkbox"/> Antenna location                     | <input type="checkbox"/> Antenna system           |
| <input type="checkbox"/> Other (summarize)                    |   |

File Number(s) \_\_\_\_\_

## 6. Exact location of transmitting antenna

(a) Give address, city/state or if no address, specify distance and bearing relative to the nearest town or landmark.

**MT CHEAHA 8.3 MILES SE OF MUNFORD, AL**

(b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates or center of array. Otherwise, specify tower location. Specify South Latitude and East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed. (The Commission requires coordinates based on NAD 27.)

Latitude	33	0	29	'	06	"	Longitude	85	0	48	'	32	"
----------	----	---	----	---	----	---	-----------	----	---	----	---	----	---

## 7. (a) Elevation (to the nearest meter)

- |   |                   |
|---|-------------------|
| (1) of site above mean sea level;   | <u>716</u> meters |
| (2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and | <u>176</u> meters |
| (3) of the top of supporting structure above mean sea level [(a)(1) + (a)(2)].  | <u>892</u> meters |

(b) Height of radiation center: (to the nearest meter)

- |   |                   |
|---|-------------------|
| (1) above ground; and                       | <u>148</u> meters |
| (2) above mean sea level [(a)(1) + (b)(1)]; | <u>864</u> meters |

8. Attach as an Exhibit sketch(es) of the supporting structure, labeling all elevations required in item 7 above. If mounted on an AM directional array element, specify heights and orientations of all array towers, as well as location of any FM radiator. \* SEE ATTACHED ENGINEERING STATMENT

Exhibit No.  
**EXHIBIT 2\***

**Section V-D -D TV BROADCAST ENGINEERING DATA (Page 3)**

**9. Antenna**

(a) Manufacturer DIELECTRIC (b) Model No. THP-0-2-1

(c) Is a directional antenna proposed? ☐ Yes ☒ No

If Yes, specify major lobe azimuth(s) N/A degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c).

Exhibit No.  
**N/A**

(d) Is electrical beam tilt proposed? ☐ Yes ☒ No

If Yes, specify N/A degrees electrical beam tilt and attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c).

Exhibit No.  
**N/A**

(e) Is mechanical beam tilt proposed? ☐ Yes ☒ No

If Yes, specify N/A degrees mechanical beam tilt toward azimuth N/A True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c).

Exhibit No.  
**N/A**

(f) The proposed antenna is: (check only one box)

☒ Horizontally polarized ☐ Circularly polarized ☐ Elliptically polarized ☐ Other: N/A

10. Will the antenna be mounted on an antenna structure which has been registered with the Commission, to include the proposed antenna installation? ☒ Yes ☐ No

If Yes, provide the seven digit registration number and, unless item 11 also applies, proceed to item 15.

1036421

11. Has the owner of the antenna structure filed an application for registration with the Commission that will include the proposed facility? ☐ Yes ☒ No

If yes, provide the date FCC Form 854 was filed and proceed to item 15.

N/A

12. (if applicable) If the antenna structure is not yet registered but will be under the Commission's phased registration plan, has the FAA previously determined that the structure would not adversely affect safety in air navigation? ☐ Yes ☐ No

**N/A**

If Yes. proceed to item 15.

13. Antenna structure will be shielded by existing structures of a permanent and substantial character or by natural terrain or topographic features of equal or greater height, and would be located in the congested area of a city, town or settlement where it is evident beyond all reasonable doubt that the structure is so shielded that it will not adversely affect safety in air navigation. and therefore does not require registration. ☐ Yes ☐ No

**N/A**

If yes, submit as an Exhibit a detailed explanation and/or diagram to support your claim and skip to item 15.

Exhibit No.  
**N/A**

**\* SEE ATTACHED ENGINEERING STATMENT**

Section V-D -D TV BROADCAST ENGINEERING DATA (Page 4)

14. Antenna structure does not otherwise meet FAA Notification criteria as defined under 47 C.F.R. Section 17.7 and therefore does not require registration.

☐ Yes ☐ No  
**N/A**

If Yes, give reason below.

**N/A**

15. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)?

☒ Yes ☐ No

If Yes, give call letter(s) or file number(s) or both,

WCIQ-TV, BLET405

- 16 Does the application propose to correct previous site coordinates?

☒ Yes\* ☐ No

If Yes, list old coordinates.

Latitude	33	°	29	'	07	"	Longitude	85	°	48	'	33	"
----------	----	---	----	---	----	---	-----------	----	---	----	---	----	---

17. Attach as an Exhibit a topographic map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the provisions of 47 C.F.R. Section 73.625(b). The map must further display clearly and legibly the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No.  
**EXHIBIT 5\***

18. Attach as an Exhibit a map (*Sectional Aeronautical Chart or equivalent*) which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.  
**EXHIBIT 6\***

- (a) the proposed transmitting location, and the radials along which profile graphs have been prepared;
- (b) the DTV coverage contour as established in 47 C.F.R. Section 73.625(b); and
- (c) the legal boundaries of the principal community to be served.

19. Terrain and coverage data (to be calculated in accordance with 47 C.F.R. Section 73.625(b))

Source of terrain data: (*check only one box below*)

- ☐ Linearly interpolated 30-second database (Source: \_\_\_\_\_)
- ☒ Linearly interpolated 3-second database (Source: DEFENSE MAPING INDUSTRY)
- ☐ 7.5 minute topographic map
- ☐ Other (*briefly summarize*)

\* SEE ATTACHED ENGINEERING STATEMENT

## Section V-D -D TV BROADCAST ENGINEERING DATA (Page 5)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted distance to the DTV Coverage Contour  (kilometers)
* 90	537	118
0	616	124
45	564	120
90	537	118
135	545	118
180	463	112
225	524	117
270	611	123
315	633	125

\*Radial through principal community, if not one of the major radials. This radial should NOT be included in the calculation of I MAT.

20. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** items I (a), (b), or (c) are answered "No.") ☒ Yes ☐ No

If No, attach as an Exhibit justification therefore, including a summary of any related previously granted waivers.

Exhibit No.  
N/A

21. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if **Certification Checklist** item 3 is answered

Exhibit No.  
N/A

22. Environmental Statement. (See 47CF.R. Section 1.1301 et seq.)

- (a) If a Commission grant of this application comes within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311.

Exhibit No.  
N/A

- (b) If No, explain briefly why not. **THE PROPOSED CONSTRUCTION WOULD HAVE NO SIGNIFICANT ENVIRONMENTAL IMPACT AS DEFINED IN §1.1307 OF THE FCC RULES. \***

- (c) Pursuant to OST Bulletin No. 65, the applicant must explain in an Exhibit what steps will be taken to limit the RF radiation exposure to the public and to persons authorized access to the tower site. In addition, where there are multiple contributors to radio frequency radiation, you must certify that the established RF radiation exposure procedures will be coordinated with all stations. \*

\*SEE ATTACHED ENGINEERING STATEMENT.

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed) <b>RYAN C. WILHOUR</b>	Relationship to Applicant (e.g., Consulting Engineer) <b>CONSULTING ENGINEER</b>
Signature	Address (include ZIP Code) <b>507 NW 60TH ST. SUITE C GAINESVILLE FL 32605</b>
Date <b>JANUARY 28, 1999</b>	Telephone No. (include Area Code) <b>352-332-3157</b>

**ENGINEERING STATEMENT OF RYAN C. WILHOUR OF THE FIRM OF KESSLER AND GEHMAN ASSOCIATES, INC., CONSULTING ENGINEERS IN CONNECTION WITH AN APPLICATION FOR THE ALABAMA EDUCATIONAL TELEVISION COMMISSION FOR A CONSTRUCTION PERMIT FOR TELEVISION BROADCAST STATION WCIQ-TV WHICH WOULD OPERATE ON DTV CHANNEL 4 WITH A MAXIMUM EFFECTIVE RADIATED POWER OF 6.3 KILOWATTS HORIZONTALLY POLARIZED AT AN EFFECTIVE ANTENNA HEIGHT OF 562 METERS ABOVE AVERAGE TERRAIN IN THE VICINITY OF MT. CHEAHA, ALABAMA**

I, Ryan C. Wilhour, am an associate of Kessler and Gehman Associates, Inc. with offices in Gainesville, Florida. I am a graduate of the University of Florida with a Bachelor of Science Degree in electrical engineering.

This firm has been employed by the Alabama Educational Television Commission to make engineering studies and to prepare the engineering portion for construction permit for television broadcast station WCIQ-TV to operate on DTV channel 4 with a maximum effective radiated power of 6.3 kilowatts horizontally polarized at an effective antenna height of 562 meters above average terrain in the vicinity of Mt. Cheaha, Alabama.

The Alabama Educational Television Commission is the licensee, File No. BLET405, of the television broadcast station WCIQ-TV that operates on NTSC channel 7.

**ATTACHED FIGURES**

In carrying out the engineering studies the following attached figures were prepared by me or under my supervision:

1. Proposed engineering specifications (Exhibit 1)
2. Elevation drawing of the antenna system (Exhibit 2)
3. Antenna Elevation Pattern (Exhibit 3)
4. USGS 7.5 minute topographic quadrangle showing the proposed transmitter location and coordinate lines (Exhibit 5)
5. Map showing the predicted DTV coverage contour (Exhibit 6)

**TRANSMITTER LOCATION**

It is proposed to use the existing support structure extending 152 meters above ground upon which the proposed Dielectric THP-O-2-1 horizontally polarized non-directional antenna will be side mounted as demonstrated in Exhibit 2. The FCC tower registration reflects the correct coordinates, ground elevation, overall height AMSL, and overall height AGL for the existing tower. Thus, this application was prepared to these specifications.

The proposed construction would have no significant environmental impact as defined in §1.1307 of the FCC Rules. The NTSC transmitter will continue to operate and will produce an effective radiated power of 316.0 kW which will produce a power density on

the ground at the base of the tower of  $0.2 \text{ mW/cm}^2$  which is 20.0% of the maximum allowable exposure assuming the beam maximum of the antenna is directed toward the ground. The DTV operation would similarly produce a power flux density of  $0.01 \text{ mW/cm}^2$  which is 0.99% of the maximum allowable exposure. Combined the power density would be 20.99% of the maximum allowed by the ANSI requirements. However, since the relative field of the vertical radiation patterns are less than 0.15 at the vertical angles more than 5 degrees below the horizon, the maximum possible power density at any point on the ground would be much less than the maximum allowed exposure level of  $1.00 \text{ mW/cm}^2$  for controlled or occupational exposure and  $0.2 \text{ mW/cm}^2$  for uncontrolled exposure. The applicant will cooperate with any other users of the tower by reducing the power to the antenna or if necessary completely cutting it off in order to protect maintenance workers on the tower. In addition the applicant will erect a fence and install warning signs to keep trespassers away from the tower.

The applicant accepts full responsibility for the elimination of any objectionable interference including that caused by intermodulation to facilities in existence or authorized prior to the grant of this application.

WCIQ was initially allotted an ERP of 1000.0 kW on channel 56 with an antenna HAAT of 610 M. Channel 56 is not in the final DTV core spectrum (channels 2 - 51) and thus would require modification before December 31, 2006. As an alternative this application proposes to use channel 4 with a reduced ERP to achieve the same coverage area as its NTSC facility. This request for a change in DTV channels meets the required mileage separation to other NTSC / DTV co-channel and adjacent channel stations as described in section §73.623(d).

KESSLER AND GEHMAN ASSOCIATES, INC.

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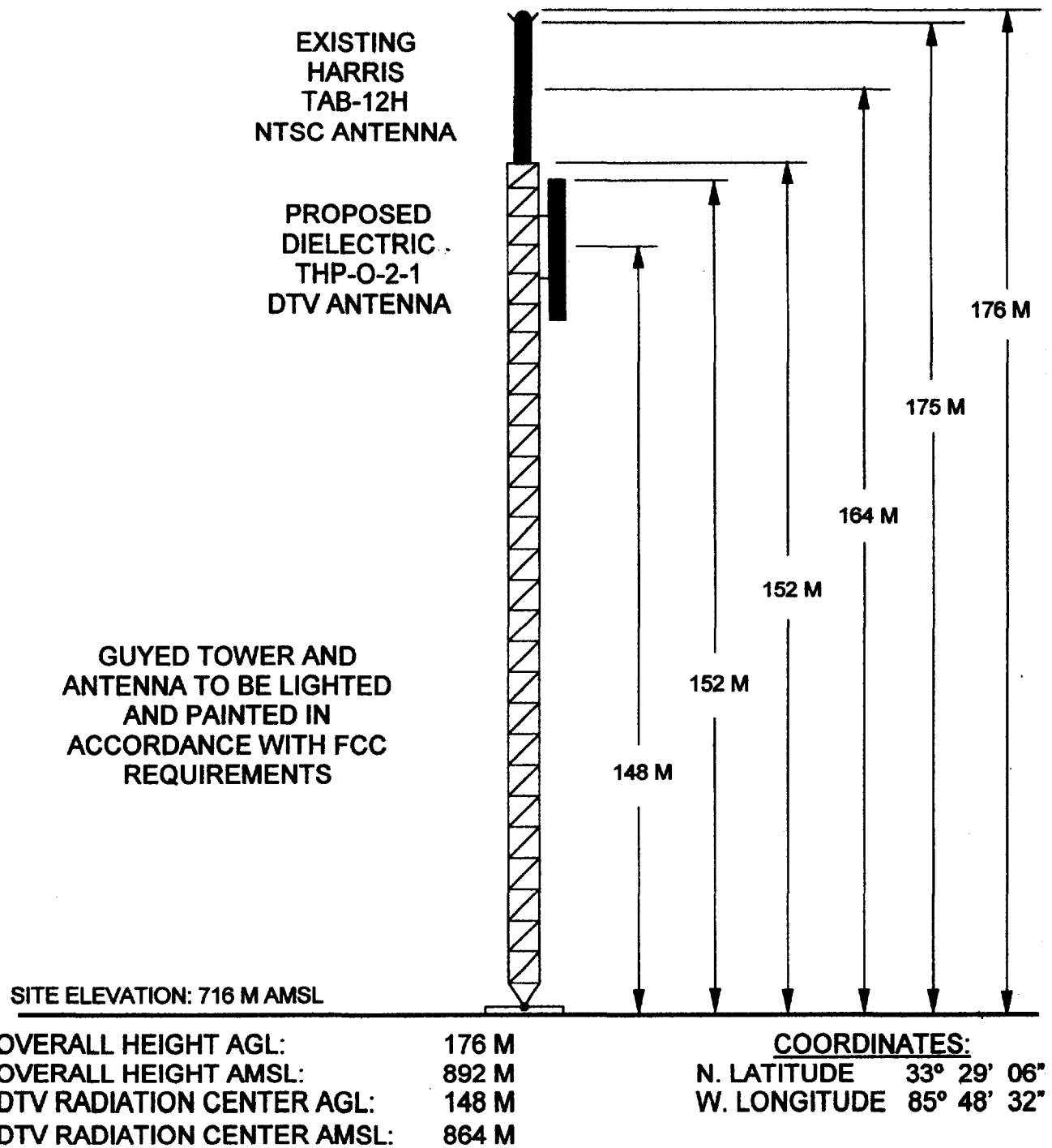
RYAN C. WILHOUR  
Engineering Consultant

**WCIQ - DT  
MT. CHEAHA, ALABAMA**

**ENGINEERING SPECIFICATIONS**

- A. Transmitter Site
- |                |             |
|----------------|-------------|
| North Latitude | 33° 29' 06" |
| West Longitude | 85° 48' 32" |
- Street Address                      At Cheaha Mountain 8.3 Miles SE of Munford,  
Alabama.
- B. Proposed Facility
- |             |           |           |
|-------------|-----------|-----------|
| DTV Channel | Number    | 4         |
|             | Frequency | 66-72 MHz |
- C. Antenna Height
- |   |      |
|---|------|
| Height of site above mean sea level (AMSL).                                       | 716m |
| Overall height of structure above ground<br>(Including all appurtenances)         | 176m |
| Overall height of structure above mean sea level<br>(Including all appurtenances) | 892m |
| Height of site above average terrain  | 414m |
| Effective height of antenna above ground  | 148m |
| Effective height of antenna above average terrain                                 | 562m |
| Effective height of antenna above mean sea level                                  | 864m |
- D. Antenna Parameters - Horizontal Polarization
- |  |         |
|--|---------|
| Maximum antenna gain in beam maximum     | 4.31dB  |
| Maximum antenna gain in horizontal plane | 4.31dB  |
| Maximum effective radiated power         | 8.00dBk |
| In beam maximum                          | 6.30kW  |
| Maximum effective radiated power         | 8.00dBk |
| In horizontal plane                      | 6.30kW  |

## ELEVATION VIEW



**NOTE: NOT TO SCALE**

**KESSLER & GEHMAN**  
TELECOMMUNICATIONS CONSULTING ENGINEERS  
507 N.W. 60th Street, Suite C  
Gainesville, Florida 32607

WCIQ - DT  
MT CHEAHA, ALABAMA

990128

EXHIBIT 2

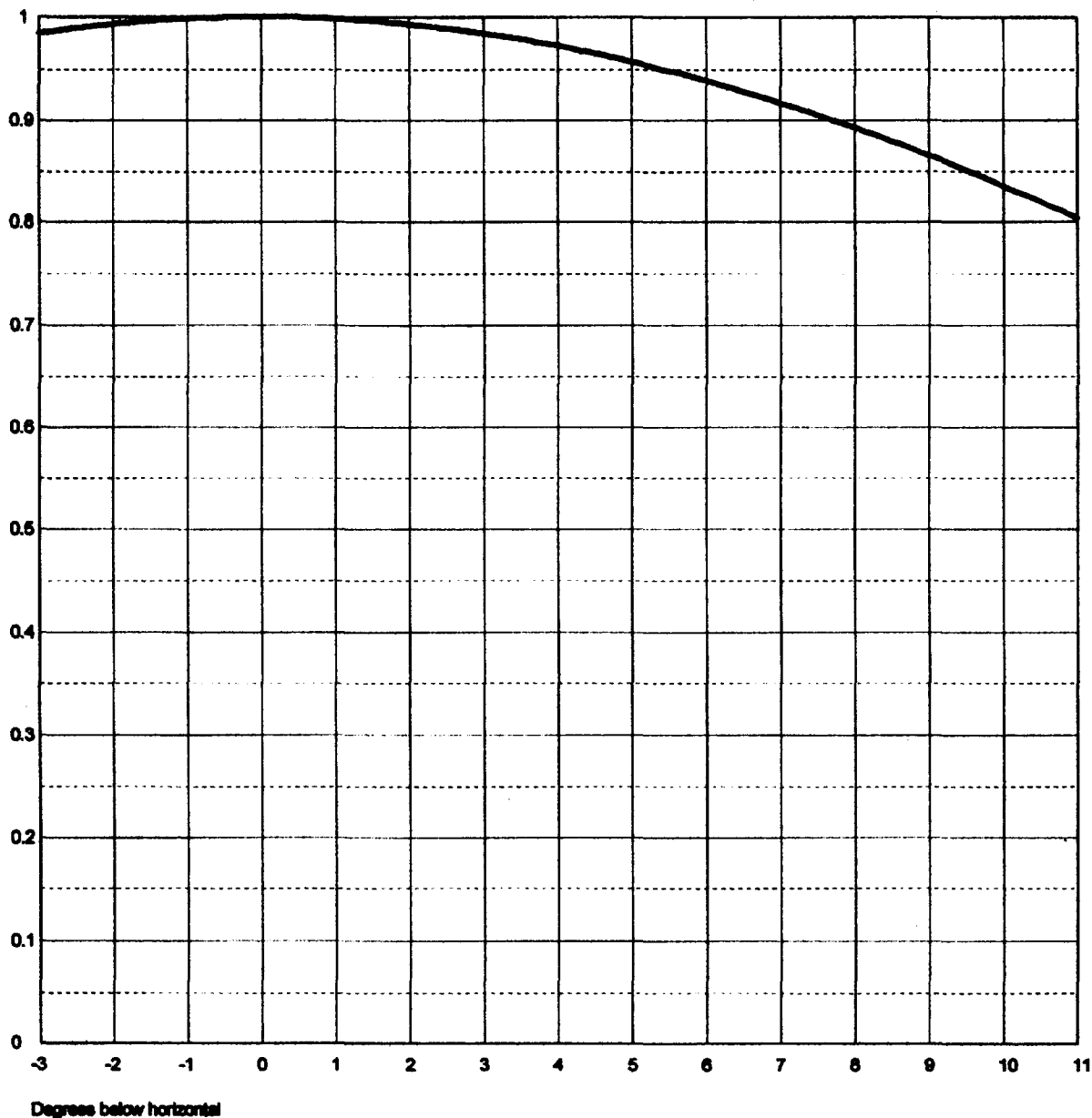
# Dielectric

A Unit of General Signal

Date	990128	
Call Letters	WCIQ-DT	Channel 4
Location	MT. CHEAHA, AL	
Customer	ALA. EDU. TV COM.	
Antenna Type	THP-O-2-1	

## ELEVATION PATTERN

RMS Gain at Main Lobe	2.1 (3.22 dB)	Beam Tilt	0.00 Degrees
RMS Gain at Horizontal	2.1 (3.22 dB)	Frequency	69.00 MHz
Calculated / Measured	Calculated	Drawing #	02H02100

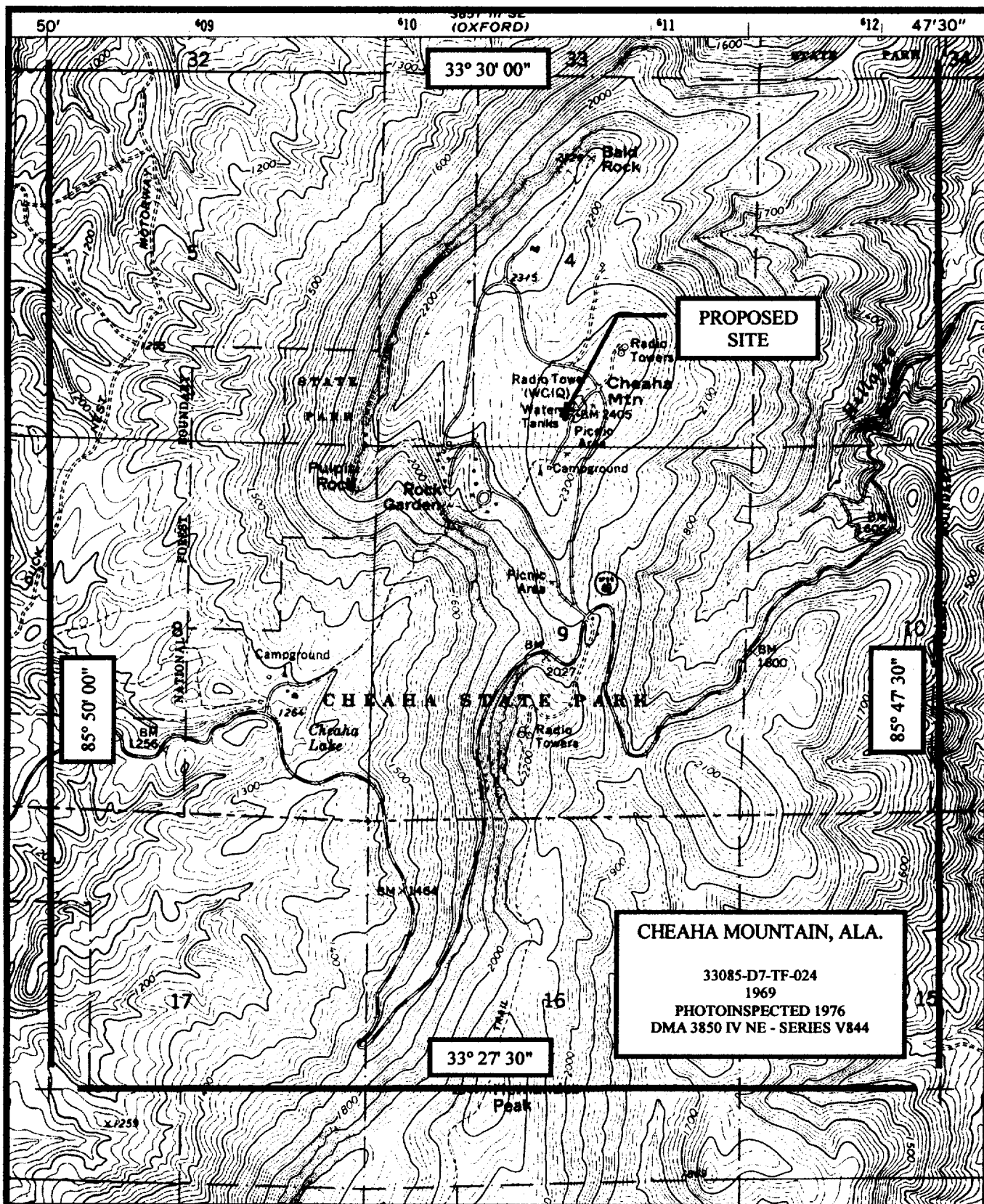


**KESSLER & GEHMAN**  
TELECOMMUNICATIONS CONSULTING ENGINEERS  
507 N.W. 60th Street, Suite C  
Gainesville, Florida 32607

WCIQ - DT  
MT. CHEAHA, ALABAMA

990128

EXHIBIT 3



# CHEAHA MOUNTAIN, ALA.

33085-D7-TF-024  
1969  
PHOTOINSPECTED 1976  
DMA 3850 IV NE - SERIES V844

## KESSLER & GEHMAN

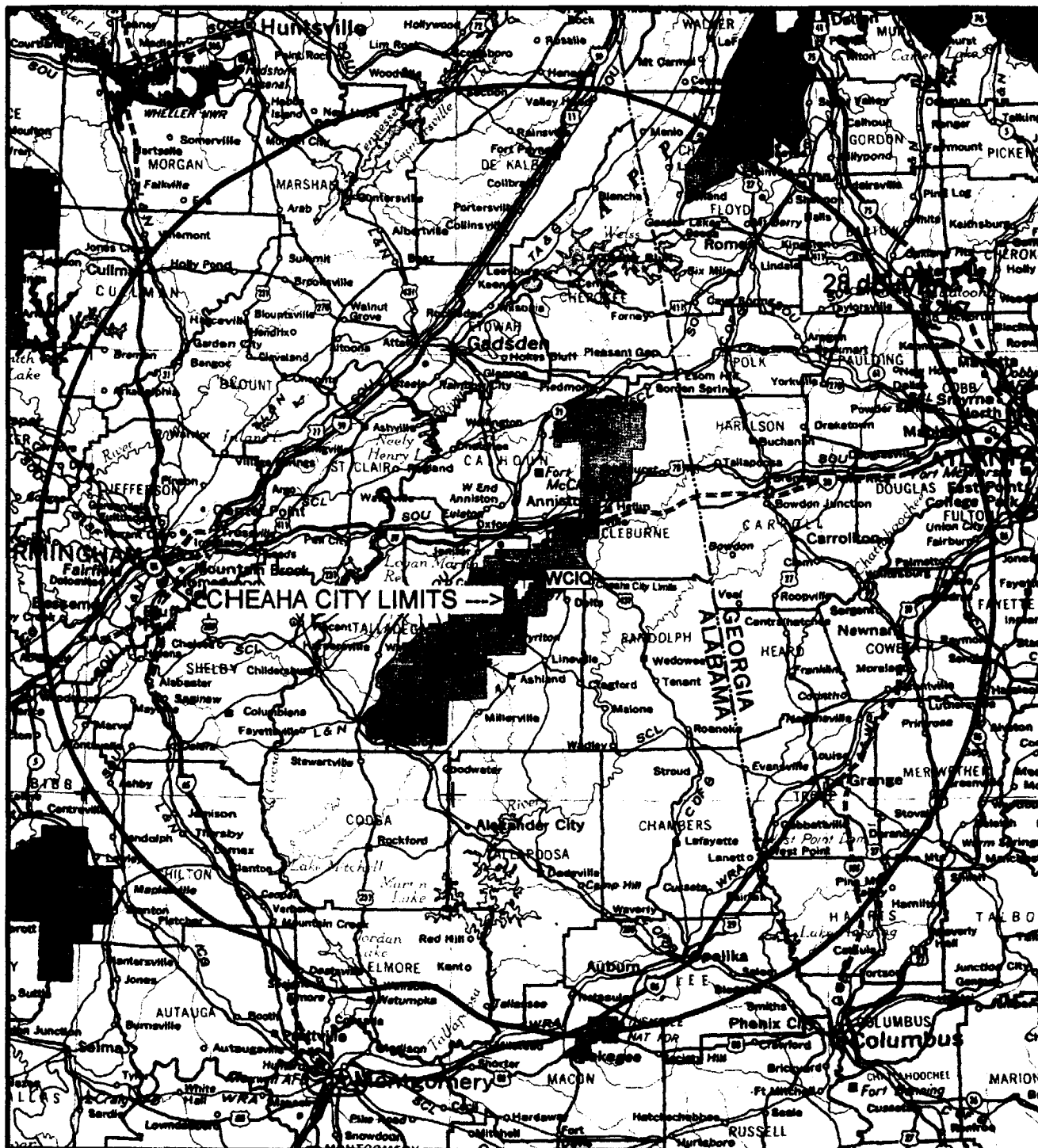
TELECOMMUNICATIONS CONSULTING ENGINEERS

507 N.W. 60th Street, Suite C  
Gainesville, Florida 32607

WCIQ - DT  
CHEAHA, ALABAMA

990128

EXHIBIT 5



SIGNAL™: WCIQ DTV COVERAGE MAP.map

Prop. model: FCC-FCC  
 Time: 90.0% Loc.: 50.0%  
 Prediction Confidence Margin: 0.0dB  
 Climate: Continental Temperate  
 Groundcover: none  
 Atmospheric Abs.: none  
 K Factor: 1.333  
 RX Antenna - Type: DA  
 Height: 9.1 m AGL Gain: 0.00 dBd  
 Field strength at remote

■ = 28.0 dBuV/m

Min. receiver threshold level: -83.8 dBmW

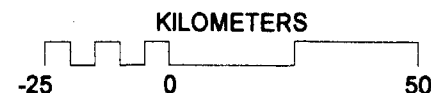
Site	Ant. Elev. AMSL (m)	ERPd (dBW)	Ant. Type/Orient.	Coordinates
WCIQ	864.0	38.00	DA-H	N33°29'06.00"
group: 1	69.0000	MHz	0.0	W85°48'32.00"

#### Notes

EFFECTIVE RADIATED POWER 6.3 KW  
 EFFECTIVE HEIGHT AAT 562 M

SOUTHERN MISSISSIPPI VALLEY STATES  
 USGS MAP

DTV CHANNEL 4



WCIQ-DT  
 DTV COVERAGE COUNTOUR

EXHIBIT 6

990128

**KESSLER & GEHMAN**

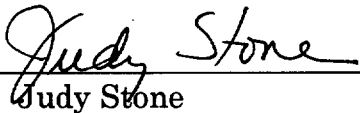
TELECOMMUNICATIONS CONSULTING ENGINEERS  
 507 N.W. 60<sup>th</sup> Street Suite C  
 Gainesville, Florida 32607

### Declaration of Judy Stone

I, Judy Stone, declare as follows:

1. I am Executive Director of the Alabama Educational Television Commission ("AETC").
2. If the proposed rulemaking amending Section 73.622, Digital Television Table of Allotments, is adopted, AETC intends to apply for Commission consent to construct the digital television facilities that will operate on the channel proposed in the attached submission.
3. If awarded this construction permit, AETC intends to construct and operate such facilities pursuant to the Commission's requirements.

I hereby declare under penalty of perjury that the statements made in this declaration are true and accurate to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Judy Stone

February 12, 1999